

(17)
4-1-02**ORIGINAL****UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA****BARBARA A. WILHELM,
Plaintiff****v.****COMMONWEALTH OF PA.;
PENNSYLVANIA STATE POLICE;
COLONEL PAUL J. EVANKO,
COMMISSIONER; LIEUTENANT
COLONEL THOMAS K. COURY; and
CAPTAIN MICHAEL. D. SIMMERS,
Defendants****NO. 1:CV-01-1057****(JUDGE RAMBO)****FILED
HARRISBURG****MAR 29 2002****MARY E. D'ANDREA, CLERK
Per [Signature]
DEPUTY CLERK****PLAINTIFF'S CONCURRED-IN MOTION FOR AN
ENLARGEMENT OF TIME TO COMPLETE DISCOVERY
AND ALL PRE-TRIAL DEADLINES**

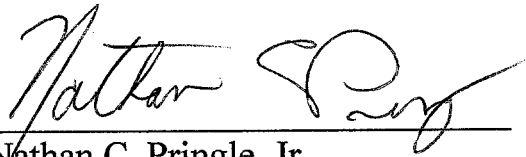
Pursuant to Fed.R.Civ.P. 6(b), Plaintiff, Barbara A. Wilhelm, by and through her attorney, Nathan C. Pringle, Jr., respectfully requests an enlargement of time of fourteen (14) days, to and including April 12, 2002, to complete discovery in this action, and an enlargement of time of fourteen (14) days for all pre-trial deadlines, and in support thereof, sets forth the following:

1. Discovery is scheduled to be completed by March 29, 2002.

2. Additional time is needed for the Defendants to provide the Plaintiff with all requested documentation.
3. Counsel for Defendants, Susan J. Forney, has no objection to this request for an enlargement of time, as indicated on the attached certificate of concurrence.

Wherefore, the Plaintiff, Barbara A. Wilhelm, respectfully requests an enlargement of time of fourteen (14) days, to and including April 12, 2002, to complete discovery, and an enlargement of time of fourteen (14) days for all pre-trial deadlines.

Respectfully Submitted,



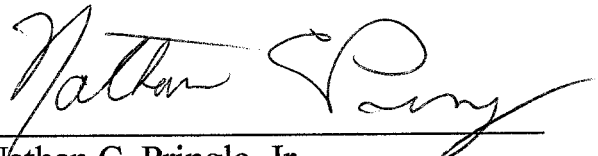
Nathan C. Pringle, Jr.
Attorney I. D. Number 30142
3601 North Progress Avenue
Suite 200
Harrisburg, PA 17110
(717) 909-8520
Attorney for Plaintiff

March 29, 2002

CERTIFICATE OF SERVICE

I, Nathan C. Pringle, Jr., hereby certify that on March 29, 2002, I caused to be delivered by first-class mail a copy of the foregoing document entitled Plaintiff's Concurred-In Motion for an Enlargement of Time To Complete Discovery And Pre-Trial Deadlines upon the following:

Susan J. Forney
Chief Deputy Attorney General
Office of Attorney General
Litigation Section
15th Floor, Strawberry Square
Harrisburg, PA 17120



Nathan C. Pringle, Jr.

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**BARBARA A. WILHELM,
Plaintiff**

v.

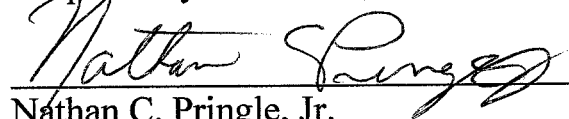
**COMMONWEALTH OF PA.;
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COLONEL PAUL J. EVANKO,
COMMISSIONER; LIEUTENANT
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Defendants**

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: **NO. 1:CV-01-1057**
:
: **(JUDGE RAMBO)**
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CERTIFICATE OF CONCURRENCE

Nathan C. Pringle, Esquire, counsel for the Plaintiff, certified that on March 27, 2002, he spoke with Susan J. Forney, Esquire, counsel for Defendants, regarding an enlargement of time to complete discovery, and all pre-trial deadlines. Ms. Forney concurred in the request.

Respectfully Submitted,



Nathan C. Pringle, Jr.
Attorney I. D. Number 30142
3601 North Progress Avenue
Suite 200
Harrisburg, PA 17110
(717) 909-8520

March 29, 2002